

# EXHIBIT A

**From:** [Glover, Joel](#)  
**To:** [Bender, Kristin](#); [Babcock, Chip](#)  
**Cc:** [Gottlieb, Michael](#); [Governski, Meryl Conant](#); [Nathan, Aaron E.](#); [Connolly, Michaela](#); [laura.prather@haynesboone.com](mailto:laura.prather@haynesboone.com); [michael.lambert@haynesboone.com](mailto:michael.lambert@haynesboone.com)  
**Subject:** RE: Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL) - Discovery  
**Date:** Thursday, June 19, 2025 2:28:25 PM  
**Attachments:** [image001.png](#)

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Thanks Kristin. Responses below in green. Let's discuss if you like.

Best,  
Joel

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**Jackson Walker LLP**

**From:** Bender, Kristin <KBender@willkie.com>  
**Sent:** Wednesday, June 18, 2025 5:57 PM  
**To:** Glover, Joel <jglover@jw.com>; Babcock, Chip <cbabcock@jw.com>  
**Cc:** Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Connolly, Michaela <MConnolly@willkie.com>; laura.prather@haynesboone.com; michael.lambert@haynesboone.com  
**Subject:** Lively et al. v. Wayfarer Studios LLC et al., Civ. No. 24-CV-10049 (LJL) - Discovery

**Caution:** \*\*External Email.

Joel,

We are circling back on the topics raised on our meet and confer on Monday. Our responses are below:

- Topic 2: You indicated that the inclusion of “client base” for Street Relations may be problematic due to the confidentiality of those relationships, and you further indicated that designating the transcript as confidential or AEO would not resolve those concerns. The customer base of Street Relations is highly relevant to Ms. Lively’s allegations of conspiracy and the ongoing campaign against her, as it is likely to demonstrate *inter alia* the existence of any pattern in the profile of customers, services, and online discourse surrounding such customers, that can be directly connected to Street Relations. This information is particularly probative in light of Street Relations/Jed Wallace disclaiming virtually all involvement in the “digital campaign” allegations by Ms. Lively. Our review of applicable authority demonstrates that disclosure of customer information is generally permissible, even where otherwise confidential, especially with the confidentiality designations that we have suggested. Given

that the questioning will focus on customers over a limited time period, and given that we are able to identify no discernible potential harm from the disclosure of this highly relevant information, we do not see a basis for limiting disclosure of the specific identities of Street Relations' customer base. Please advise whether you agree, or whether you intend to seek a protective order on this issue to limit the scope of questioning as to the identities of Street Relations' customer base from January 1, 2023 to the present. If the latter, we would appreciate an opportunity to review the authority on which you are relying for your position.

I first said that our view was that the names of other Street clients were irrelevant to Lively's claims against Street in this case. I asked why Lively needed specific names instead of descriptions of the types of clients by category (as examples here, filmmakers, actors, private citizens, dog catchers, etc.), and I pointed out that Street would testify about the services it provides. It seems from this explanation that Lively wants to conduct discovery into Street's clients—none of which are named, mentioned, or otherwise called into question in this lawsuit—because she would like to piece together something that (she thinks) looks like what (she alleges) happened here. We do not agree to open Street or its clients up to this type of fishing expedition. Customer lists may be discoverable in other contexts and with other aims (not to mention for claims other than the 2 against Street), but we do not see how they are discoverable in this case. And given this explanation, it appears to us that no level of confidentiality designation would protect Street's business from the harassing and burdensome nature of Lively's plan. To answer your question about confidentiality, yes, Street has confidentiality agreements with its clients.

But I'm happy to be educated about this. Please send me the applicable authority that your team reviewed allowing for discovery into this type of speculative search for patterns. Depending on what that case law says, we may need to move for protection on this issue.

- Topic 3: You sought confirmation that we are not seeking information regarding Jackson Walker LLP as an "agent" for Street Relations through its role as litigation counsel in this litigation. Confirmed.

Great.

- Topics 10, 13: You asked for an explanation as to the relevance of Street Relations' relationships with other clients. Please see the response to Topic 2.

Same.

Additionally, please advise who is/are the designated 30(b)(6) representative(s) for Street Relations.

We will get you the name(s) after we resolve this last issue on topics 2, 10, and 13.

Last, we have yet to receive the initial disclosures by Street Relations and Mr. Wallace that are required under Federal Rule of Procedure 26(a). These mandatory disclosures are long overdue and the failure to timely provide them is substantially prejudicial to Ms. Lively. Please provide Mr. Wallace's and Street Relation's Rule 26(a) initial disclosures by the end of the day on Friday, June 20.

**We will work to get these out in less than 48 hours and over the Juneteenth holiday as requested, but no later than Monday, June 23.**

Regards,

Kristin

**Kristin Bender**

**Willkie Farr & Gallagher LLP**

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